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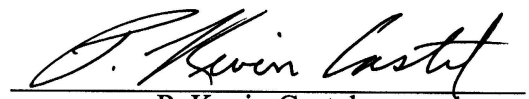
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November 4, 2020

The time for defendants to file post-verdict motions pursuant to Rules 29 and 33 is extended to November 25, 2020. The government's response is due December 16, 2020 and defendants' replies are due December 23, 2020.

SO ORDERED.

11/5/2020



P. Kevin Castel
United States District Judge

By ECF

Honorable P. Kevin Castel
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

**Re: United States v. Ramon Ramirez & Vance Collins
19 Cr. 395 (PKC)**

Dear Judge Castel,

We write on behalf of defendants Vance Collins and Ramon Ramirez to respectfully request an extension of time pursuant to Fed. Rule of Crim. Proc. 45 to file any defense post-trial motions pursuant to Fed. Rules of Crim. Proc. 29 and 33.

Rule 29 provides that “[a] defendant may move for a judgment of acquittal, or renew such a motion, within 14 days after a guilty verdict or after the court discharges the jury, whichever is later.” Fed. R. Crim. P. 29(c)(1). Similarly, Rule 33 provides that “[a]ny motion for a new trial grounded on any reason other than newly discovered evidence must be filed within 14 days after the verdict or finding of guilty.” Fed. R. Crim. P. 33(b)(2). Rule 45 allows the Court to extend the 14-day deadlines under Rules 29 and 33 upon a defendant’s motion made, *inter alia*, “before the originally prescribed or previously extended time expires.” Fed. R. Crim. P. 45(b)(1)(A); *see also United States v. Midyett*, No. 07-CR-874(KAM), 2010 WL 1992191, at *1 (E.D.N.Y. May 14, 2010).¹

Consistent with this request, and with the consent of the Government, Mr. Ramirez and Mr. Collins propose the following schedule for submitting any post-trial motions:

Defendants’ Post-Trial Motions:

November 25, 2020

¹ The jury returned its verdict on October 21, 2020, 14-days ago pursuant to Rule 45(a).

Government's Response:
Defendants' Reply:

December 16, 2020
December 23, 2020

Thank you.

Respectfully Submitted,

/s/ Matthew J. Kluger
Matthew J. Kluger
Jodi L. Morales
Attorneys for Ramon Ramirez

/s/ Eric Breslin
Eric Breslin
Arletta Bussiere
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cc: AUSA Frank Balsamello
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